

REMARKS

I. Status of Claims

Claims 1-24 are pending. Claims 1, 9 and 17 are independent. Applicants note with appreciation the allowance of claims 5, 13 and 21 if rewritten in independent form.

II. Entry of Amendments

Claims 5, 13 and 21 have been amended to be rewritten in independent form to include the limitations of their corresponding independent claims and intervening dependent claims. Accordingly, intervening dependent claims 4, 12 and 20 have been canceled. Claims 25 – 37 have been added to provide a more complete scope of protection for the present invention. Support for the new claims 25 - 37 is provided at pages 81 and 82 of the application and Figs. 51-66, as well as at pages 17-67 and the Appendix with regard to configuration of the system and specifying a campaign. Accordingly, no new matter is being added. Applicants respectfully assert that the Shtivelman et al '066 patent does not disclose the queuing component as recited in the new independent claims 25, 34 and 37.

III. Claim Rejection over U.S. Patent No. 6,263,066 to Shtivelman et al.

The Examiner has rejected claims 1-4, 6-12, 14-20 and 22-24 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,263,066, to Shtivelman et al. Applicants respectfully request reconsideration and withdrawal of this rejection in view of the Declaration under 37 C.F.R. 1.131 filed herewith. The Declaration is signed by an officer of the assignee of the entire interest of the above-captioned application pursuant to M.P.E.P. §715.04.

As stated in the attached Declaration, the critical reference date is the filing date of the Shtivelman et al '066 patent (i.e., June 11, 1998). The family of patents listed on the title page of the Shtivelman et al '066 patent have been reviewed and none are deemed to be relevant. U.S. Patent No. 6,044,146 describes use of the disclosed communication router with multimedia communication mediums such as e-mails or Internet Protocol Network Telephony (IPNT) calls,

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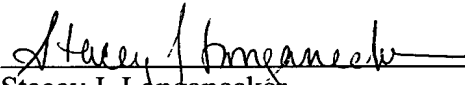
as well as voice calls (see column 8, lines 50-65 of the '146 patent). Queuing of the IPNT calls, however, is described as using a separate queue from queue 69. Similarly, U.S. Patent No. 6,002,760 describes a queue for IPNT environment transactions that is separate from a queue for voice calls, that is, uses a TCP/IP connection rather than POTS lines as stated in column 6, lines 18-29 of the '760 patent. The queue discussed in U.S. Patent No. 5,926,539 is a queue at an agent's station for storing unanswered calls, which can be multimedia. The queue disclosed in the '539 patent does not teach a common queue as claimed for storing contacts for routing to workstations of agents. Finally, U.S. Patent No. 5,765,033 merely discloses an e-mail router and therefore is silent regarding routing of multimedia contacts and a common queue therefor as claimed in the present application.

IV. Conclusion

In view of the above, it is believed that the above-identified application is in condition for allowance, and notice to that effect is respectfully requested. Should the Examiner have any questions, the Examiner is encouraged to contact the undersigned at the telephone number indicated below.

Respectfully submitted,

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